

United States District Court  
for the  
District of Massachusetts

Civil Action  
No. 04CV11605RWZ

The Prudential Insurance Company  
of America,  
Plaintiff

vs.

Agreement for Judgment

Paulette I. Sanchez, et al,  
Defendants

Now come all parties to this action and agree that judgment enter in this action, as follows:

1. As described in their affidavits attached hereto as Exhibits A, B, C and D, the Defendants, Paulette L. Sanchez, Jeri-Lyn Sanchez a/k/a Jeri-Lyn Fournier, Todd Sanchez and the minor children, Katelyn Sanchez (DOB: 3/13/1998) and Todd M. Sanchez, Jr. (DOB: 4/12/2000), by their mother and next friend, Tracy Levesque of 333 Durfee Street, Fall River, MA, agree to the distribution of the funds being held by the Plaintiff, as described in paragraph 12 of the complaint in this action.

2. The Plaintiff, therefore, is to distribute said funds directly to the Defendants, in the following manner:

(a) the sum of \$150,000.00 is to be paid to Paulette L. Sanchez;

(b) the sum of \$20,000.00 is to be paid to Jeri-Lyn Sanchez a/k/a Jeri-Lyn Fournier;

(c) the sum of \$10,000.00 is to be paid to Todd M. Sanchez;

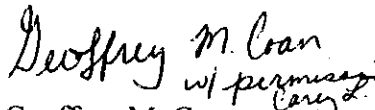
(d) the sum of \$10,000.00 is to be paid to Tracy Levesque, as Trustee for Katelyn Sanchez; and,

(e) the sum of \$10,000.00 is to be paid to Tracy Levesque, as Trustee for Todd M. Sanchez, Jr.

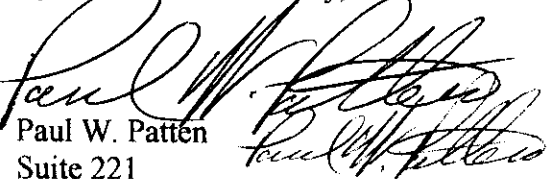
3. Upon completion of said distribution, the Plaintiff will be held free from all claims and/or causes of action of any type by any and all of the Defendants related to said funds which are the subject matter of this action.

4. All parties waive any and all claims for costs and/or fees, including attorney fees, which they may have relative to this action.


By Plaintiff's Attorney,

  
Geoffrey M. Coan  
Wilson, Ecker, Moskowitz, Edelman  
& Dicker LLP  
155 Federal Street  
Boston, MA 02110  
(617)422-5300  
BBO#641998

By Defendants' Attorney,

  
Paul W. Patten  
Suite 221  
56 North Main Street  
Fall River, MA 02720  
(508)672-3559  
BBO#391400

So Ordered:

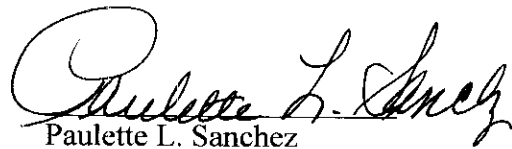
  
Zobel, J., Presiding Judge  
Dated: 10/20/04

AFFIDAVIT

I, Paulette L. Sanchez of 451 Renaud Street, Fall River, MA 02721 do hereby state under oath the following to be true:

1. I am the spouse of the deceased, Gerald J. Sanchez, who applied for life insurance coverage from Prudential Insurance through Servicemen's Group Life Insurance under Prudential Group Policy No. 104-81669.
2. Under the terms of the Application for Servicemen's Group Life Insurance submitted by Gerald J. Sanchez, I am a designated beneficiary who is entitled to receive 75% of the proceeds of the (\$200,000) Two Hundred Thousand Dollar life insurance policy.
3. I have read the complaint for interpleader filed by Prudential Insurance Company in the United States District Court, District of Massachusetts, # 04-11605 RWZ.
4. I agree and consent to the distribution of the life insurance proceeds in the respective percentages presented to the Court by Prudential and as stated in the Application for Servicemen's Group Life Insurance (Exhibit C) of the complaint.
5. I understand the contents of the complaint and have consulted with an attorney.
6. I am doing this of my own free will and have not been coerced to sign this document.
7. I understand that by consenting to the distribution as requested by Prudential that I am forever waiving any rights to challenge the interpleader and any distributions made in accordance with Gerald J. Sanchez' application and order of the Court.

Signed under the pains and penalties of perjury on this 31<sup>st</sup> day of August, 2004.

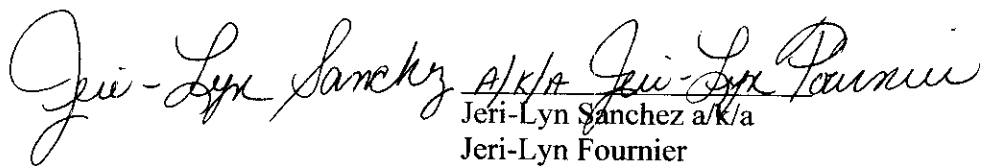
  
Paulette L. Sanchez

AFFIDAVIT

I, Jeri-Lyn Sanchez a/k/a Jeri-Lyn Fournier of 996 Walnut Street, Fall River, MA 02720 do hereby state under oath the following to be true:

1. I am the daughter of the deceased, Gerald J. Sanchez, who applied for life insurance coverage from Prudential Insurance through Servicemen's Group Life Insurance under Prudential Group Policy No. 104-81669.
2. Under the terms of the Application for Servicemen's Group Life Insurance submitted by Gerald J. Sanchez, I am a designated beneficiary who is entitled to receive 10% of the proceeds of the (\$200,000) Two Hundred Thousand Dollar life insurance policy.
3. I have read the complaint for interpleader filed by Prudential Insurance Company in the United States District Court, District of Massachusetts, # 04-11605 RWZ.
4. I agree and consent to the distribution of the life insurance proceeds in the respective percentages presented to the Court by Prudential and as stated in the Application for Servicemen's Group Life Insurance (Exhibit C) of the complaint.
5. I understand the contents of the complaint and have consulted with an attorney.
6. I am doing this of my own free will and have not been coerced to sign this document.
7. I understand that by consenting to the distribution as requested by Prudential that I am forever waiving any rights to challenge the interpleader and any distributions made in accordance with Gerald J. Sanchez' application and order of the Court.

Signed under the pains and penalties of perjury on this 31<sup>st</sup> day of August, 2004.

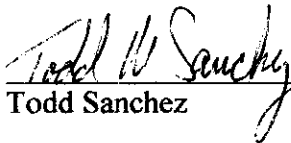
  
Jeri-Lyn Sanchez a/k/a  
Jeri-Lyn Fournier

AFFIDAVIT

I, Todd Sanchez of 451 Renaud Street, Fall River, MA 02721 and 2199 KAM H64, Honolulu, Hawaii, 96819 do hereby state under oath the following to be true:

1. I am the son of the deceased, Gerald J. Sanchez, who applied for life insurance coverage from Prudential Insurance through Servicemen's Group Life Insurance under Prudential Group Policy No. 104-81669.
2. Under the terms of the Application for Servicemen's Group Life Insurance submitted by Gerald J. Sanchez, I am a designated beneficiary who is entitled to receive 5% of the proceeds of the (\$200,000) Two Hundred Thousand Dollar life insurance policy.
3. I have read the complaint for interpleader filed by Prudential Insurance Company in the United States District Court, District of Massachusetts, # 04-11605 RWZ.
4. I agree and consent to the distribution of the life insurance proceeds in the respective percentages presented to the Court by Prudential and as stated in the Application for Servicemen's Group Life Insurance (Exhibit C) of the complaint.
5. I understand the contents of the complaint and have consulted with an attorney.
6. I am doing this of my own free will and have not been coerced to sign this document.
7. I understand that by consenting to the distribution as requested by Prudential that I am forever waiving any rights to challenge the interpleader and any distributions made in accordance with Gerald J. Sanchez' application and order of the Court.

Signed under the pains and penalties of perjury on this 13 day of September, 2004.

  
Todd Sanchez

AFFIDAVIT

I, Tracy Levesque of 333 Durfee Street, Fall River, MA 02720 do hereby state under oath the following to be true:

1. I am the mother, custodial parent and next best friend of Katelynn Sanchez (DOB: 3/13/98) and Todd M. Sanchez, Jr. (4/12/2000), the grandchildren of the deceased, Gerald J. Sanchez, who applied for life insurance coverage from Prudential Insurance through Servicemen's Group Life Insurance under Prudential Group Policy No. 104-81669.
2. Under the terms of the Application for Servicemen's Group Life Insurance submitted by Gerald J. Sanchez, I am a mother of the designated minor beneficiaries who are entitled to receive 5% each amounting to a total of (\$20,000.00) of the proceeds of the (\$200,000) Two Hundred Thousand Dollar life insurance policy.
3. I have read the complaint for interpleader filed by Prudential Insurance Company in the United States District Court, District of Massachusetts, # 04-11605 RWZ.
4. I agree and consent to the distribution of the life insurance proceeds in the respective percentages presented to the Court by Prudential and as stated in the Application for Servicemen's Group Life Insurance (Exhibit C) of the complaint.
5. I understand the contents of the complaint and have consulted with an attorney.
6. I am doing this of my own free will and have not been coerced to sign this document.
7. I understand that by consenting to the distribution as requested by Prudential that I am forever waiving any rights to challenge the interpleader and any distributions made in accordance with Gerald J. Sanchez' application and order of the Court.
8. I understand that any proceeds payable to the minor children shall be placed into a trust for their benefit to be distributed to them upon the age of (18) eighteen.

9. I understand that I shall be the trustee of the trust created for the benefit of the minor children.

Signed under the pains and penalties of perjury on this 31<sup>st</sup> day of August, 2004.

  
Tracey Levesque